

REMARKS

This application has been reviewed in light of the Office Action dated March 9, 2010. Claims 38 and 40-44 are presented for examination, of which Claims 38 and 40 are in independent form. Claims 27-37, 39, and 45-60 were previously withdrawn from consideration. Favorable reconsideration is respectfully requested.

In the outstanding Office Action, Claims 38 and 40-44 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent 6,400,103 (*Adamson*).

Applicants have carefully studied the Office Action and *Adamson*, but still believe, for the following reasons, that the independent claims are patentable over that reference.

Claim 38

Applicants believe it is worthwhile to reproduce Claim 38 in full:

“A lamp operating device arranged to operate a lamp, the lamp operating device being operable in one of a plurality of available operational modes selectable by a central control unit, the lamp operating device also arranged to interpret commands provided by a local control unit, based on the available operational mode selected by the central control unit, to control the lamp.”

Applicants wish to point out that, according to Claim 38, the claimed lamp operating device must be “operable in one of a plurality of available operational modes” - that is, the device must be capable of operating in at least two modes, among which a selection can be made. The selection, according to Claim 38, is made by a central control unit. More particularly, according to Claim 38, the lamp operating device operates in a mode that is selected by the central control unit.

In addition, according to Claim 38, the lamp operating device is arranged “to interpret commands provided by a local control unit, ..., to control the lamp”; that is, the claimed device also is able to interpret commands provided by a local control unit. According to Claim 38, further, the lamp operating device performs this interpretation “based on the available operational mode selected by the central control unit”.

Thus, in summary of the foregoing, the device claimed in Claim 38:

- (a) can operate in an operational mode selected by a central control unit; and
- (b) based on the selected operational mode, interpret commands provided by a local control unit.

The Office Action cites ballasts 220, 222, 224, and 240 of *Adamson* as corresponding to the lamp operating device referred to in Claim 38, elements 242, 226, 228, and 230 as corresponding to the lamp referred to in Claim 38, and elements 202, 204, and 206 as corresponding to the central control unit referred to in that claim (see page 2 of the Office Action).

However, nothing has been found, or pointed out, in *Adamson* that would disclose or suggest a lamp operating device being operable in one of a plurality of available operational modes selected by a central control unit. As understood from *Adamson*, the ballasts 220, 222, 224, and 240, which are alleged to correspond to the recited lamp operating device of Claim 38, are always operating in a single operational mode and are therefore not even capable of being operable in one of a plurality of available operational modes selected by a central control unit. Apparently, in *Adamson*, a central control station 200 can generate commands to control a lighting device, such as devices 226, 228, 230, and 242 (Fig. 2). In the case of controller 206, that controller only has two inputs and one output. Controllers, such as controllers 206, 238, 210, 218, and 214 are mode selected locally by setting the mode selector (e.g., mode selector 232 of controller 206) at the controller (e.g., controller 206) in either one of two modes: a first mode to receive input signals from a rotary switch (e.g., rotary switch 204), or a second mode to receive input signals from another input (e.g., the communication interface 202). See, e.g., col. 6, lines 33-35. However, the controller 206 can only decide if the signal of the dimmer control 204 or the signal of the communications interface 202 is passed to the output of the controller

206. The devices 202, 204, and 206 therefore, are not separately or in combination, able to select one of a plurality of available operational modes of the controllers 206, 238, 210, 218, and 214, much less the ballasts 220, 222, 224, and 240, which receive the output from those controllers.

Accordingly, the ballasts 220, 222, 224, and 240, which are alleged to correspond to the lamp operating device of Claim 38, cannot be “operable in one of a plurality of available operational modes selectable by a central control unit”, as recited in Claim 38.

In contradistinction to the arrangement in *Adamson*, the central control unit referred to in Claim 38 selects the operational mode of the lamp operating device which tells the lamp operating device how to interpret a command, such as a dimming command, received from a local control unit. Such a command will be interpreted differently or changed depending upon the operational mode selected by the central control unit. For example, if there is only a “switch on-off” mode selected as the operational mode in a lamp operating device, a command received from a dimmer will be interpreted at the lamp operating device as either an on or an off command. If, however, a dimming mode is selected as the operational mode of the lamp operating device, then a command received from a dimmer will be interpreted as a dimming command. (Of course, this example is for purposes of illustration only, and is not intended to be limiting to the scope of the claimed invention).

Even if *Adamson*’s ballasts 220, 222, 224, and 240 can interpret a signal or a command from a dimmer, those ballasts always interpret such a signal or command in only one way. For example, in a case where the ballasts 220, 222, 224, and 240 are constructed to operate in a dimming mode they can only interpret those commands in one way (i.e., as a dimming command), and none of the devices shown in *Adamson* can change this operational mode to another operational mode. Contrary to this arrangement in *Adamson*, signals and control commands, passing through the lamp operating devices of Claim 38, can be changed as desired

based on the operational mode selected for the lamp operating device. Therefore, by virtue of the feature of selecting and setting different operational modes in the lamp operating device, it is possible for the lamp operating device to interpret the same control command in different ways depending on the operational mode selected by the control unit.

Accordingly, for the above reasons, it is believed plain that Claim 38 is allowable over *Adamson*.

Claim 40

Independent Claim 40 is similar to Claim 38, but is a method claim:

“A method for operating a lamp by means of a lamp operating device, wherein the method comprises:

selecting, by a central control unit, one of a plurality of available operational modes for the lamp operating device; and

at the lamp operating device, interpreting at least one command provided by a local control unit, depending on the operating mode selected in the selecting, to control the lamp based on the operational mode selected in the selecting.”

Thus, Claim 40 recites selection of an operational mode at the central control unit, and also recites that a lamp operating device interprets a command from a local control unit in a fashion that depends on the selected operating mode. Accordingly, it is believed clear that the foregoing remarks concerning Claim 38 apply equally to Claim 40, which must also be considered allowable over *Adamson*.

A review of the other art of record has failed to reveal anything that, in Applicants' opinion, would remedy the deficiencies of the art discussed above, as a reference against the independent claims herein. Therefore, those claims are respectfully submitted to be patentable over the art of record.

The other claims under examination in this application depend from one or the other of the independent claims discussed above, and, therefore, are submitted to be patentable over the prior art for at least the same reasons. Since each dependent claim is also deemed to

define an additional aspect of the invention, however, individual reconsideration of the patentability of each claim on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.